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Steve Schrader, Stephen Fleming, Robert  
Willison, and Anthony Furey*

**UNITED STATES DISTRICT COURT**

## DISTRICT OF NEVADA

10 ED LOMONT and LUIS ANGULO,  
11 derivatively on behalf of nominal defendant  
Workhorse Group, Inc.,

Case No.: 2:22-cv-00980-CDS-VCF

12 || Plaintiffs,

13 | vs.

14 DUANE HUGHES, STEVE SCHRADER,  
15 ROBERT WILLISON, STEPHEN  
FLEMING, ANTHONY FUREY,  
16 RAYMOND CHESS, GERALD BUDDE,  
H. BENJAMIN SAMUELS, HARRY  
17 DEMOTT, MICHAEL CLARK, PAMELA  
MADER, and JACQUELINE DEDO,

**STIPULATION AND ORDER TO  
EXTEND TIME FOR DEFENDANTS TO  
RESPOND TO PLAINTIFF'S  
COMPLAINT**

(First Request)

#### Defendants.

19 WORKHORSE GROUP, INC.

### Nominal Defendant

Pursuant to Local Rules IA 6-1 and 7-1, Defendants Duane A. Hughes (“Hughes”), Steve Schrader (“Schrader”), Stephen Fleming (“Fleming”), Robert Willison (“Willison”), and Anthony Furey (“Furey”) (collectively, “Defendants”) and Plaintiffs Ed Lomont and Luis Angulo (“Plaintiffs”), hereby stipulate, agree and respectfully request that the Court extend the deadline for Defendants to answer or otherwise respond to Plaintiffs’ Complaint (ECF No. 1) from September 16, 2022 to October 17, 2022.

1           Due to recent rulings in cases raising similar issues pending in the United States District  
2 Court for the Central District of California and the Eighth Judicial District Court for Clark  
3 County, Nevada, the parties require further time to evaluate the claims and defenses in this matter  
4 prior to the filing of Defendants' responsive pleading.

5           The request is not for purposes of delay. This is the first request by the parties.  
6 Dated this 13th day of September, 2022.

7           McDONALD CARANO LLP

MUCKLEROY LUNT

8           By: /s/ Jeff Silvestri

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Counsel for Plaintiffs

IT IS SO ORDERED.



21           Cam Ferenbach  
22          United States Magistrate Judge

23          9-19-2022

DATED \_\_\_\_\_